

Subject: Explanation of Requirements for Fall Protection on Aerial Work Platforms

This document summarizes the requirements of the standards pertaining to fall protection on aerial work platforms in the United States and Canada and attempts to answer some common questions on this subject. It is important to note that the primary means of fall protection on all aerial work platforms is provided by the guardrail system. However, there are some instances when a second level of fall protection is required by the standards for aerial work platforms.

OSHA and ANSI

Fall protection in construction workplaces is addressed in 29 CFR parts 1926.500, 501, and 502. The rules outline three systems to protect a worker from falling which include guardrails, safety nets, and personal fall arrest (PFA). The rules require the use of only *one* of these systems when required at a construction site. OSHA does not address fall protection for aerial work platforms in these sections. Fall protection on aerial lifts is addressed in 29 CFR 1926.453 where the only reference to the use of lanyards and body belts (and most recently, full body harnesses) is for use on equipment covered in ANSI A92.2-1969 Vehicle-Mounted Elevating And Rotating Aerial Devices. This section of the CFR also references “National Consensus Standards,” the most current version of the ANSI A92 standards, and states that conformance to them will “provide employee protection equivalent to that provided through the application of ANSI A92.2 1969.” A list of these ANSI standards is included in the non-mandatory appendix C to subpart L and is titled “List of National Consensus Standards.” This list includes ANSI A92.3 (Manually Propelled Aerial Platforms) and A92.6 (Self-Propelled Elevating Work Platforms - Scissor lifts), neither of which requires the use of fall protection other than the guardrail unless the machine is designed to be used with the guardrail removed.

Although the guardrail systems on all Genie products are designed to meet the requirements of 29 CFR, 1926.501, as noted above, OSHA references ANSI (A92) “National Consensus Standards” to provide information for safe industry practice on issues including fall protection for aerial lifts. Therefore, according to OSHA, fall protection requirements on aerial work platforms are provided by ANSI A92 standards in conjunction with applicable workplace safety requirements from OSHA.

Fall Protection Requirements on Booms:

The ANSI standards for Boom-Supported Elevating Work Platforms (ANSI A92.5) and Vehicle-Mounted Elevating and Rotating Aerial Devices (ANSI A92.2) require the use of a lanyard and harness in addition to a guardrail for operator fall protection.

The primary purpose of a secondary fall arrest system (lanyard and harness) is to prevent the operator from being ejected (catapulted) from the platform while the machine is traveling. Genie Industries recommends the use of a “Restraint Device” (a device that prevents the worker from falling **any** distance) whenever possible. However, if a “fall arrest system” is used (a system that is designed to arrest a fall from the platform), the components must include a full body harness and a shock absorbing lanyard that comply with OSHA regulations. Genie recommends that operators use the shortest lanyard possible that will still allow them to accomplish their work while standing in the platform. All lanyard anchorage points for these products are designed to meet the 5000 pound OSHA requirements of a personal fall arrest system.

Note: OSHA allows operators of aerial work platforms to use a body belt if fall restraint equipment is used as described above. Genie Industries requires the use of an approved full body harness unless it can be demonstrated that the personal fall protection equipment and system using a body belt will prevent the operator from falling **any** distance.

Fall Protection Requirements on Manually Propelled and Scissor Lift Products:

OSHA also references the ANSI standards for Manually Propelled Elevating Work Platforms (ANSI A92.3) and Self-Propelled Elevating Work Platforms (Scissor lifts) (ANSI A92.6). Products of this type do not require the use of PFA in addition to guardrails. If a user (employer) requires an operator to use PFA in addition to guardrails on manually propelled or scissor type lifts, Genie Industries recommends the use of a restraint device to prevent the operator from falling any distance. Lanyard attachment points on these machines are provided but do not replace the guardrail as a means of fall protection. The lanyard anchorage points meet the requirement to hold 5000 pounds for Scissor lifts and 3600 pounds for manually propelled aerial platforms. Guardrails are not approved attachment anchors for fall protection on any Genie aerial platforms.

Safe and appropriate use of personal fall protection equipment on any personnel lift is the responsibility of the Operator and User (Employer) and is accomplished by strict conformance to OSHA regulations, the Operator’s Manual, ANSI Manual of Responsibilities, and safety decals found on the machine.

Summary of Fall Protection Requirements For Genie Products:

ANSI Standard	Genie Products Affected	Fall Protection Requirement
ANSI A92.2 / CSA-C225 Vehicle Mounted Booms	TMZ, TZ trailer mounted booms	Use of approved harness and lanyard is required
ANSI A92.3 / CSA B354.1 Manually Propelled Elevating Platforms	AWP, IWP,CWP, DPL, PLI, PLC, EUP, EUM, PLP	The guardrail provides fall protection. Personal fall protection Is Not required
ANSI A92.5 / CSA B354.4 Boom Supported Work Platforms	All self-propelled “S” and “Z” booms	Use of approved harness and lanyard is required
ANSI A92.6 / CSA B354.2 Self Propelled Elevating Work Platforms	Scissors, Runabout	The guardrail provides fall protection. Personal fall protection Is Not required

All Genie aerial work platforms are to be operated in accordance with the operator’s manual, and all operators must be trained before operating a machine. All Genie operator’s manuals are written to encourage operator compliance with the most current versions of ANSI and OSHA.

If you have questions regarding these requirements, please contact the Product Standards and Compliance Group at 800-536-1800.